

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 15-CV-11915

**SHARON McDONALD,
Plaintiff**

v.

**CITY OF BOSTON and
RICHARD WALKER,
Defendants.**

**DEFENDANT CITY OF BOSTON'S EXPERT WITNESS DISCLOSURE
PURSUANT TO FED. R. CIV. P. 26(a)(2)(C)**

Pursuant to Fed. R. Civ. P. 26(a)(2)(C), Defendant City of Boston ("Defendant"), hereby discloses the following expert:

I. IDENTITY OF EXPERT

Jack Ryan
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Plainfield, Indiana 46168
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Cellular Phone (401) 692-1555
FAX (317) 386-8228
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II. SUBJECT MATTER OF EXPERT TESTIMONY

Mr. Ryan will testify as to his review of various documents depicting the extent of Defendant Det. Walker's investigation of an armed robbery on May 22, 2012. Mr. Ryan will opine on the reasonableness and sufficiency of Detective Walker's investigation and application for an arrest warrant of Plaintiff, as well as the policies, practices, supervision, and training of the Boston

Police Department. The full extent of Mr. Ryan's testimony is contained in his written report which was provided to all counsel of record.

III. EXPERT OPINION

Mr. Ryan will testify that Det. Walker had a totality of circumstances that would lead a reasonable and well-trained officer to believe that it was proper to seek an arrest warrant for the Plaintiff, and that Det. Walker conducted his investigation in a manner consistent with generally accepted police policies and practices. Further Mr. Ryan will testify that the Boston Police Department was in no way deficient regarding its policies, procedures, customs, investigation, or training.

IV. SUBSTANCE OF GROUNDS FOR THE OPINIONS

In addition to Mr. Ryan's education, background, training, and experience, his opinions and conclusions are also based upon his review of various documents including: Plaintiff's Complaint; vehicle registration reports; surveillance photographs and video footage of the robbery; Plaintiff and Det. Walker's deposition transcripts; various Boston police documents and reports regarding the robbery, including but not limited to incidents reports and photo identification lineups; Plaintiff's Law Enforcement Expert Charles Drago's report; and Boston Police Internal Affairs file reviewing Det. Walker's investigation. Mr. Ryan's curriculum vitae, as well a list of his publications and previous testimony was provided to all counsel of record in addition to Mr. Ryan's fee agreement.

Respectfully submitted,
DEFENDANT, CITY OF BOSTON

By its attorneys,

Eugene L. O'Flaherty
Corporation Counsel

/s/ Katherine N. Galle
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on January 2, 2018.

/s/ Katherine N. Galle